

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

HOLMES,	)	
Plaintiff,	)	
	)	
v.	)	Case No. 20CV6437
	)	
SALINAS, ET AL.	)	Judge Elaine E. Bucklo
Defendants.	)	

**MOTION TO WITHDRAW AS COUNSEL**

NOW COME the Plaintiff's attorneys, Abby D. Bakos and Ronak Maisuria of Bakos & Maisuria Law Group, respectfully moving this Court to withdraw their appearances as counsel for the Plaintiff in this matter. In support thereof, the undersigned state as follows:

1. After being retained by Plaintiff on May 13 and May 14, 2024, the undersigned attorneys filed their respective appearances in this case. Dkts. 136 & 137.
2. Since January 31, 2023, discovery in this matter has been stayed pending the outcome of the criminal prosecutions of Defendant Salinas and Tafara Williams, a witness/contributor to the decedent's death.
3. Irreconcilable differences as to the direction of this litigation have arisen between the undersigned and the Plaintiff, Ms. Holmes.
4. Consequently, the undersigned counsels of record hereby request leave to withdraw as Plaintiff's counsels.
5. This motion will not prejudice the representation of the Plaintiff nor cause any undue delay in this proceeding as this matter is stayed.
6. The undersigned has consulted with Defendant's counsel, Mr. Bersani, and was informed that he is not aware of any trial dates set for Defendant Salinas or Tafara Williams. Thus,

discovery will likely continue to be stayed in this case for at least 30 days. Indeed, Plaintiff will have an ample opportunity to secure alternative representation before the stay is lifted.

7. Pursuant to the local rules, the notification of party contact information has been filed as an attachment contemporaneously with this motion.

WHEREFORE, the undersigned attorneys respectfully request this Honorable Court grant the undersigned's motion for leave to withdraw and for any additional relief that this court may deem equitable and just.

Respectfully submitted,

/s/ Abby D. Bakos

/s/ Ronak Maisuria

Bakos & Maisuria Law Group, LLC  
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#### **CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that she served the foregoing Motion to Withdraw, upon all attorneys of record via CM/ECF Filing and the Plaintiff, via email and certified mail at Ms. Holmes' last known address on August 6, 2024.

Respectfully submitted,

/s/ Ronak Maisuria

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